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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

C.K.

Plaintiff,

v.

JEFFREY RIGUEUR a/k/a JEFFREY R. WING,

Defendant.

Case No. 1:24-cv-2778

DECLARATION OF C.K.

I, C.K., being of full age, hereby declare:

1. I am the Plaintiff in the above-captioned case. I submit this Declaration in support of my request to proceed under the pseudonym “C.K.”

2. I request the court permit me to bring this case as “C.K.” for several reasons.

3. Though I only dated Defendant for a handful of months, the damage he has done and is continuing to do to my life has been staggering.

4. Defendant has placed intimate images and videos of me on his popular OnlyFans page, The Cosmonaut. As evidenced by the angle of the camera and the blindfold I am wearing, I was unaware many of the videos Defendant captured were even being recorded. In the two I knew about, Defendant and I specifically discussed that they would remain between the two of us.

5. Defendant was aware I never wanted these videos to be shared and the harm that I would face should other people see them.

6. Specifically, the Defendant's page is followed by other pages and, once he shared the videos of me online, other websites republished them. I have spent months trying to remove them from the internet and, due to the nature of the internet, will need to be vigilant in monitoring for additional uploads for the rest of my life.

7. Soon after I realized what Defendant had done, I retained an attorney to demand that he delete the content and stop selling it on his website. I was relieved to hear that his attorney promised my lawyer he would delete everything and stop uploading them.

8. Unfortunately, it seems Defendant's representations were false as I received a notification in February that Defendant had once again offered the videos of me for sale.

9. Defendant was made aware of the emotional distress these videos were causing me, yet callously continued to disseminate them.

10. I am a private person and fear that my career could be ruined should Defendant be able to continue to harass me in these proceedings by using my privacy against me.

11. Defendant is intent on ruining my reputation by way of widespread public humiliation and he has no qualms with breaking laws or lying to accomplish that.

12. Being forced to proceed using my true name would be devastating.

13. The photos and videos contained in Defendant's posts are of a highly private nature. I certainly never gave him permission or consent to share the content and, in fact, we specifically discussed that it would remain private between us.

14. Beyond that, Defendant's goal is very clearly to humiliate me and ruin my life. Forcing me to use my real name in filings will only further link me to his bad acts in public records,

truly devastating my name and reputation simply because I trusted a man who was apparently not deserving of that trust.

15. I fear that if my name is included in the pleadings, Defendant will take the opportunity to further monetize his OnlyFans account and broaden his dissemination of my content.

16. Defendant's actions have been hurtful and humiliating enough; I am not certain I would be willing to proceed with a lawsuit against him if I were forced to broadcast to the world what he has done to me using my full name.

17. My attorneys have informed me that courts permit parties to proceed using their initials in situations involving highly sensitive matters and when forcing them to use their full names would be revictimizing. That is exactly what would happen here.

18. Filing this lawsuit using my full name would be yet another invasion of my privacy and would force me to reveal more of my private moments and information to anyone who wishes to view the public record.

19. I respectfully ask for this court's assistance in allowing me to hold onto some parts of my private life without inextricably and publicly linking my name to Defendant's heinous acts.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: April 9, 2024

A handwritten signature in black ink, appearing to be "C.K.", written over a horizontal line.